



Department of Energy
Idaho Operations Office
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May 3, 2007

Nicholas Ceto, INL Project Manager
EPA Region 10
309 Bradley Landing, Suite 115
Richland, WA 99352

Daryl F. Koch, FFA/CO PM
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-1255

SUBJECT: Minor Change to Remedy for Tank V-9 Waste Treatment for Waste Area Group
1, Operable Unit 1-10 (FMDP-RFDP-07-007)

Dear Mr. Ceto and Mr. Koch:

In January of 2007 the CERCLA agencies signed the "Explanation of Significant Differences (ESD) for the Record of Decision for the Test Area North Operable Unit 1-10" (DOE/ID-11300). Specifically, the ESD documented significant changes to the selected remedy for a portion of the TSF-18 waste stream that currently resides within the V-9 tank. The primary change in the ESD was to provide approval of a treatment variance necessary to address higher concentrations of mercury than had been expected when the original remedy had been selected. At the time the ESD was signed, treatment was expected to occur at an off-site, out-of-state location.

Since that time, the offsite facility has been unable obtain the treatment permits necessary to perform treatment within a timeframe that will meet current FFA/CO enforceable milestones. In light of the non-availability of treatment at that or other offsite facilities, a location at the Idaho National Laboratory has been identified.

This change in treatment location has been evaluated with respect to Chapter 7 of the Environmental Protection Agency's "A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents (July 1999)." Section 7.2 of that guide specifies that the lead agency must evaluate changes with respect to scope, performance, and cost in order to determine whether the change is minor, significant, or fundamental as well as the type of documentation necessary.

The change in treatment location for remaining waste in the V-9 tank from an off-site location to the INL does not change the type or amount of waste treated. The volume of waste to be treated as well as the chemicals of concern remains exactly the same, as well as the treatment levels. All of the waste in the V-9 tank will still be treated to the extent necessary to meet Land Disposal

Restrictions (LDR) including the variance specified in the ESD for mercury and the Idaho CERCLA Disposal Facility (ICDF) Waste Acceptance Criteria (WAC). As the exact same waste will be treated to the same requirements the change in treatment location for the V-9 tank will not affect the protectiveness of the selected remedy for the waste in the V-9 tank. The costs associated with this change in treatment location will not significantly change the overall cost of the remediation of the V-tank system. The cost of treatment at the INL will be equivalent to those that would have been incurred for off-site out-of-state treatment.

This change in treatment location does not significantly alter the scope of the remedy, does not alter the performance of the remedy, and will not materially affect the cost of the remedy. Therefore, as the lead agency, DOE-ID has determined that this change in the remedy is non-significant. This documentation, including concurrence letters from the EPA and the Idaho DEQ project managers, will be included within the INL administrative record. In addition, a public notice will be issued notifying the public of this change.

As always, please call me at 208-526-5793 with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nolan R. Jensen', with a long horizontal flourish extending to the right.

Nolan R. Jensen, FFA/CO Project Manager
Facility and Material Disposition Project

cc: T. Livieratos, DEQ, 1410 N. Hilton, Boise, ID 83706
M. Wilkening, EPA Region X, Idaho Ops Office, 1435 N. Orchard St., Boise, ID 83706